

California Native Plant Society

September 12, 2005

US Army Corps of Engineers
Operations Branch POC – Phyllis Traboldt
915 Wilshire, Suite 11123
Los Angeles, CA 90017

RE: South Fire Break

The California Native Plant Society (CNPS) is a non-profit statewide organization with over 9700 members. The Los Angeles/Santa Monica Mountains Chapter has about 500 members and is one of three CNPS Chapters in Los Angeles County. CNPS is dedicated to the preservation of California's native flora through science, education and advocacy.

CNPS opposes the creation of the proposed dirt road/firebreak in the Wildlife Reserve.

The road will fragment the landscape (especially the large stand of *Baccharis* spp.) and allow for the introduction of weedy species in areas that currently have a closed canopy. The creation of berms along the fire road will create permanent disturbed areas that will always be prime habitat for weeds. This is particularly important in an area where we already are fighting two major invasive weeds – perennial pepperweed (*Lepidium latifolium*) and star thistle (*Centaurea solstitialis*).

The road will permanently eliminate approximately 1/3 acre of Wildlife Reserve (although the included map does not show the entire proposed road, so it is hard to confirm such a measurement) without mitigating the direct loss of wildlife habitat. Also, roads are known to be vectors for non-native plant and animal species, therefore the impacted area will include the width of the road and a minimum of five feet beyond the edge of the road. The wildlife habitat created in this area was mitigation for previous developments in the Basin, so a loss of wildlife habitat without direct mitigation is unacceptable. [Furthermore, it is unclear if the 1500 feet of road describes the shorter road only, or includes the longer, alternative alignment.] Given the small amount of riparian habitat in the San Fernando Valley, it is incredible that the City would propose to diminish an area set aside for riparian habitat as part of the Sepulveda Basin Master Plan and Final Environmental impact report.

There is no guarantee that this project will prevent additional fires in the Wildlife Area. What will prevent the homeless from seeking out more secluded spots within the Basin. When this happens, will the Fire Dept. request additional roads further reducing the natural area? If the fire problem is caused by homeless persons, why is there not a proposal to deal directly with that reality?

There may be benefits to having fires in the Sepulveda Basin Wildlife Area. The past fires seem to burn slowly (after all, this is native riparian vegetation) and burn in patches. This patchy fire pattern leads to uneven aged stands, and that is good for wildlife, and also good to prevent a real big fire from getting started due to years of accumulation of dead brush. Also, the burning of debris left by previous floods along with dead vegetation removes a great deal of "mass" from the Basin, allowing for better flood control (i.e. more room for the water). Also, the shantytowns of the homeless also are destroyed with the fire and the more "open" vegetation suppresses the use of the recently burnt areas by the homeless.

The Fire Department has stated that in previous fires, helicopters have been used. Has a cost analysis of building and maintaining a road as opposed to the use of helicopters been done?

Section 5.0 of your report (Mitigation – if needed) is very weak. CNPS believes there must be direct mitigation for loss of wildlife habitat from the construction of the road and from the "edge" effect along the road, and there must be mitigation to mitigate the loss of an area that is serving as mitigation for off-site damage. Furthermore, the mitigation proposed consisting of a "perpetual weed abatement program managed by the City of Los Angeles RAP to be conducted at selected areas near the project site" has no source of funding and therefore no guarantee that it would happen. How will this mitigation plan be monitored? Who will decide what methods will be used on weed control? Will a wildlife area manager be in charge?



Mitigation

In order to directly mitigate the loss of wildlife habitat, CNPS suggests that the official Wildlife Area be expanded to include the ruderal field just west of the road leading to the Archery Fields (north of the Wildlife Area) and include the lower portion of Haskell Creek north of the road leading into the Wildlife Area. This area would require revegetation of the field and non-native tree / shrub removal along Haskell Creek.

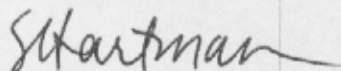
In the past, for projects that only temporarily disturbed an area (Tillman ROW), projects were mitigated 3:1. This project completely destroys valuable unfragmented riparian habitat and CNPS suggests that is be mitigated 10:1.

A permanent fund must be established to pay for the non-native plant control/removal program. CNPS believes that it is the weeds in the Wildlife Reserve that contribute greatly to the spread of fire, and that a well-funded perpetual weed abatement program would significantly contribute to the reduction of spread of fire. Be advised that non-native plants invade disturbed areas (road edges and back 5 feet), and non-native plants and grasses are the wicks that spread a flash fire into the canopy of native riparian species (trees and shrubs).

CNPS proposes that the elimination of the increasing stands of large evergreen ash trees (*Fraxinus uhdei*) and eucalyptus trees be required in the 46-acre* portion of the wildlife area where the fire road is proposed. Evergreen ash is now towering above the natives trees and shrubs along the Haskell Creek riparian corridor and diminishes the benefits to native wildlife. Eucalyptus trees are fire hazards and produce seeds that end up creating forests of eucalyptus trees (that are native to Australia).

The Sepulveda Basin is a world-class urban Wildlife Area. It is the best birding spot in the Valley and attracts visitors from around the world when they visit Los Angeles. The City needs to recognize the value of this resource and rather than trying to fix the problem of the homeless with band-aids aimed at fire suppression that actually increases fire potential and intensity, it should directly grapple with the homeless problem as it impacts a tremendous natural resource.

Sincerely,



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* There seems to be some confusion about the size of the "South Reserve" bounded by Burbank Blvd. on the north, the LA River on the west, and the dam face elsewhere. Item 3.1 (b) describes a "46-acre riparian woodland" but 4.0 (Alternatives Review) calls it a "43-acre parcel" and the Sepulveda Basin Master Plan calls it 48-acres.

California Native Plant Society

January 10, 2006

U.S. Army Corps of Engineers
Attn: Mr. Carvel Bass CESPL-CO-O
PO Box 532711
Los Angeles, CA 90053-2325

Re: Fire Access Road

Dear Carvel:

As you know, the California Native Plant Society opposes the proposed project for reasons made very clear in previous comments.

In case this project is implemented, we have the following comments regarding the proposed mitigation.

First, why is the mitigation 3:1 and not 10:1 that would be more appropriate for the destruction of riparian habitat?

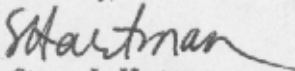
Second, for how many years will the "area for enhancement" be treated for the "eventual eradication" of non-native species? CNPS recommends at least 5 years.

Third, CNPS strongly recommends that, in addition to treatment of weeds, native plants be planted in the areas where weeds are treated in order to help prevent the invasion of more weed species.

Last, why is item 5.0 Mitigation followed by "(if needed)"? That contradicts the description describing the "FULL ACTION alternative."

Thank you very much for giving us plenty of opportunity to comment on this proposal.

Sincerely,



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Dedicated to the preservation of California native flora

